

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**RUSHING & GUICE PROPERTIES, L.L.C. and  
RUSHING & GUICE, P.L.L.C.**

**PLAINTIFFS**

**VERSUS**

**CIVIL ACTION NO. 1:08-cv-01302-HSO-JMR**

**UNITED STATES FIDELITY AND  
GUARANTY COMPANY, THE TRAVELERS  
COMPANIES, INC. and ST. PAUL FIRE  
AND MARINE**

**DEFENDANTS**

**OBJECTIONS AND RESPONSE TO SUBPOENA  
DUCES TECUM ON RUSHING & GUICE PROPERTIES, L.L.C.**

COMES NOW Plaintiff, Rushing & Guice Properties, L.L.C., and files herewith its Objections and Response to Subpoena Duces Tecum as follows:

**GENERAL OBJECTIONS**

1. The [76] subpoena duces tecum fails to allow a reasonable time to comply.
2. The subpoena duces tecum requires disclosure of privileged or other protected matters.
3. The subpoena duces tecum imposes an undue burden for compliance.
4. The subpoena duces tecum is in violation of this Court's [5] Case Management Order, as it constitutes in excess of the number of requests for production permitted.

5. The subpoena duces tecum is duplicative of requests previously propounded and responded to.

6. The items requested in the subpoena duces tecum are overbroad.

7. Documents requested are irrelevant and will not lead to the discovery of admissible evidence.

**RESPONSE**

Without waiving any of the above objections, this Plaintiff responds to the requests for documents requested in the subpoena duces tecum as follows:

1. No extra expense loss claim has been submitted by this Plaintiff.

2. None.

3. None.

4. Discoverable documents responsive to this request have been previously produced.

5. Discoverable documents responsive to this request have been previously produced.

6. Financial records of this Plaintiff are not relevant.

7. Not applicable.

8. Discoverable documents responsive to this request have been previously produced.

9. None.

10. See Rushing & Guice, P.L.L.C. general ledger for building at bates numbers RUSH001500-RUSH001517.

11. See Rushing & Guice, P.L.L.C. general ledger for building at bates numbers RUSH001500-RUSH001517.

12. None.

13. Discoverable documents responsive to this request have been previously produced.

This the 27<sup>th</sup> day of January, 2010.

Respectfully submitted,

RUSHING & GUICE PROPERTIES,  
L.L.C.

BY: *s/Judy M. Guice*  
JUDY M. GUICE (MSB #5057)

Judy M. Guice (MSB #5057)  
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**CERTIFICATE OF SERVICE**

I, Judy M. Guice, counsel for Plaintiffs, do hereby certify that I have this day electronically filed the foregoing with the Clerk of this Court using the ECF system which sent notification of such filing to the following:

Charles G. Copeland, Esquire  
Laurie R. Williams, Esquire  
COPELAND, COOK, TAYLOR AND BUSH, P.A.  
P. O. Box 6020  
Ridgeland, MS 39158

This the 27<sup>th</sup> day of January, 2010.

*s/Judy M. Guice*  
JUDY M. GUICE (MSB #5057)